

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

V.

**TIMOTHY BURROUGHS, JAY HOLSTINE,
JOHN GRIFFIN, AND MICHAEL OSWALD
WILLIAMS**

Defendants.

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**Case No.: 4:21-cv-00994-SDJ**

# UNOPPOSED MOTION TO ENTER FINAL JUDGMENT AGAINST DEFENDANT JOHN GRIFFIN

Plaintiff Securities and Exchange Commission (“SEC”) files this Unopposed Motion to Enter Final Judgment against Defendant John Griffin (“Griffin”), and respectfully shows the Court as follows:

1. The SEC filed this civil action on December 27, 2021, alleging violations of the federal securities laws. *See* Dkt. No. 1.
2. The SEC has reached a settlement with Griffin, who has executed a written consent (“Consent”), attached hereto as Exhibit A, which sets out the terms of the agreement. Under the terms of the Consent, Griffin, *inter alia*: (a) waives service of a summons; (b) enters a general appearance; (c) admits the Court’s jurisdiction over him and over the subject matter of this action; (d) waives the entry of findings of fact and conclusions of law; (e) consents to the entry of the Final Judgment, which is attached hereto as Exhibit B; and (f) waives any right to appeal from the

Final Judgment. Further, counsel for Griffin has reviewed the Consent and Final Judgment and has signed the Consent to reflect his approval as to form. See Exhibit A, p. 6.

3. The Final Judgment provides that Griffin is, *inter alia*:
  - (a) enjoined from future violations of Section 5 of the Securities Act of 1933 (“Securities Act”) [15 U.S.C. § 77e] and Section 15(a) of the Securities Exchange Act of 1934 (“Exchange Act”) [15 U.S.C. § 78o(d)];
  - (b) ordered to pay disgorgement of \$124,884.01 together with prejudgment interest thereon in the amount of \$25,585.83; and
  - (c) ordered to pay a civil penalty in the amount of \$50,000 under Section 20(d) of the Securities Act [16 U.S.C. § 77t(d)] and Section 21(d)(3) of the Exchange Act [15 U.S.C. § 78u(d)(3)].

4. The Final Judgment disposes of all issues in the SEC’s case against Griffin. However, as set forth in the Final Judgment, this Court shall retain jurisdiction of this matter for the purposes of enforcing the terms in the Final Judgment.

5. Thus, the SEC respectfully requests that the Court enter the Final Judgment consented to by Griffin.

Dated: December 30, 2021

Respectfully submitted,

/s/ Jason P. Reinsch

Jason P. Reinsch

Texas Bar No. 24040120

United States Securities and Exchange Commission

Fort Worth Regional Office

801 Cherry Street, Suite 1900

Fort Worth, Texas 76102

(817) 900-2601 (phone)

(817) 978-4927 (facsimile)

ReinschJ@SEC.gov

ATTORNEY FOR PLAINTIFF SECURITIES  
AND EXCHANGE COMMISSION

**CERTIFICATE OF CONFERENCE**

Pursuant to the attached Consent, Griffin agrees that the SEC may, without further notice, present the Final Judgment to the Court for entry. See Exhibit A at ¶ 14. Further, I conferred with counsel for Griffin, who confirmed he is unopposed to the filing of this motion and to the relief requested.

/s/ Jason P. Reinsch

JASON P. REINSCH

**CERTIFICATE OF SERVICE**

I hereby certify that on December 30, 2021, I electronically filed the foregoing via the Court's CM/ECF filing system, which will send a notice of electronic filing to all CM/ECF participants. I further certify that I served a true and correct copy of the foregoing document and the notice of electronic filing via electronic mail or U.S. Mail or other common carrier on all non-CM/ECF parties and/or their counsel as detailed below:

|                                                                                                                                               |                                                                                                                                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| Timothy Burroughs<br>3209 Hillsdale Ct.<br>Plano, TX 75093<br><i>Pro Se Defendant</i>                                                         | John Griffin<br>c/o Toby M. Galloway<br>300 Throckmorton Street, Suite 1700<br>Fort Worth, Texas 76102<br><i>Counsel for Defendant</i> |
| Jay Holstine<br>c/o Matthew Nielsen<br>Bracewell LLP<br>1445 Ross Avenue<br>Suite 3800<br>Dallas, Texas 75202<br><i>Counsel for Defendant</i> | Michael Oswald Williams<br>c/o Arnold Spencer<br>201 Main Street, Suite 1440<br>Fort Worth, TX 76102<br><i>Counsel for Defendant</i>   |

/s/ Jason P. Reinsch

Jason P. Reinsch